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August 9, 2021

**BY ECF AND ELECTRONIC MAIL**

Hon. Ann Marie Donio, U.S.M.J.  
United States District Court for the  
District of New Jersey  
Mitchell H. Cohen U.S. Courthouse, Room 2010  
1 John F. Gerry Plaza  
4<sup>th</sup> & Cooper Streets  
Camden, New Jersey 08101

Re: Audra Capps, et al. v. Joseph Dixon, et al.  
Case No.: 1:19-cv-12002-RMB-AMD

Tanika Joyce, et al v. Joseph Dixon, et al.  
Case No.: 1:20-cv-01118- RMB-AMD

Dear Judge Donio:

I represent Plaintiffs in the above-captioned cases. The parties in these cases are scheduled for a telephone conference before Your Honor on Wednesday, August 11, 2021 at 2:00 p.m. The main topic of discussion at that telephone conference is expected to revolve around outstanding discovery issues. The Court requested, in its July 13, 2021 Scheduling Order, a joint status report. While I do not feel that the parties would be able to agree on such a document, given the correspondence and the relatively profound disagreements about discovery set forth in those documents, I did circulate an earlier version of this letter to defense counsel this morning. As of this writing, I have not received a response. Thus, I am submitting, without argument at this time, an inventory of documents and correspondence which relate to the current discovery disputes. Plaintiffs alternatively request that this letter be considered as correspondence to the Court pursuant to Local Civ. Rule 37.1. Background on the scope of the discovery issues may be derived from my letter of July 28, 2021, Exhibit "E" below.

Please note that, while this letter itself is being submitted on the public docket, a version with the attachments will be submitted to Your Honor by electronic mail. I am taking that step because certain sensitive issues for discussion are contained in either my July 28, 2021 letter and/or contained in various discovery responses submitted by the parties.

The inventory of attachments are as follows.

1. Attached as Exhibit “A” is a copy of the Court’s Scheduling Order of June 2, 2020, which, among other things, required the parties to serve written discovery by June 30, 2020 in the Joyce case.

2. Attached as Exhibit “B” is a copy of my June 29, 2020 letter serving written discovery on Defendants in the Joyce case. Defendant Dixon served written discovery requests in the Joyce case upon Plaintiff on or about July 23, 2021. Defendants Farabella and the City of Millville served written discovery upon Plaintiff in the Joyce case on August 5, 2021.

3. Attached as Exhibit “C” is a copy of my February 16, 2021 letter to Defendants regarding discovery issues.

4. Attached as Exhibit “D” is a copy of the Court’s July 13, 2021 Scheduling Order which, among other things, required Defendants to provide responses to Plaintiff Joyce’s discovery responses by August 2, 2021.

5. Attached as Exhibit “E” is my discovery deficiency letter to Defendants dated July 28, 2021.

6. Attached as Exhibit “F” is my July 29, 2021 letter to Defendants regarding discovery issues.

7. Attached as Exhibit “G” is my letter to Defendants dated August 3, 2021, providing them with the last two outstanding items from a production provided by the New Jersey Office of Attorney General, Office of Public Integrity and Accountability.

8. Attached as Exhibit “H” is a copy of a letter from counsel for Defendants Millville and Farabella dated August 4, 2021.

9. Attached as Exhibit “I” is a copy of an email from counsel for Defendant Dixon dated August 5, 2021.

10. Attached as Exhibit “J” is a copy of Dixon’s Answers to Interrogatories in the Joyce case, which contain my previously propounded Interrogatories, which were sent back to me.

11. Attached as Exhibit “K” is a copy of Dixon’s responses to Document Requests in the Joyce case, which contain my previously propounded Document Requests, which were sent back to me.

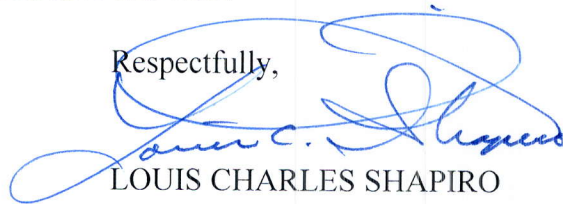
12. Attached as Exhibit "L" is a copy of Defendants' August 5, 2021 letter transmitting Answers to Interrogatories of Defendants Farabella and the City of Millville in the Joyce case.

13. Attached as Exhibit "M" is a copy of Farabella's Answers to Interrogatories in the Joyce case.

14. Attached as Exhibit "N" is a copy of the City of Millville's Answers to Interrogatories in the Joyce case.

I thank the Court for its time and attention to this case.

Respectfully,



LOUIS CHARLES SHAPIRO

Enclosures

cc: Justin T. Loughry, Esquire (w/encl.)